

Exhibit F

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

PROXENSE, LLC,

Plaintiff,

vs.

SAMSUNG ELECTRONICS, CO., LTD.
AND SAMSUNG ELECTRONICS
AMERICA, INC.,

Defendant.

Case Nos. 6:21-cv-00210-ADA

JURY TRIAL DEMANDED

PROXENSE'S PROPOSED CLAIM CONSTRUCTIONS

Pursuant to the Proposed Scheduling Order governing this action, Plaintiff Proxense, LLC (“Proxense” or “Plaintiff”) hereby provides its proposed claims constructions for all the terms previously identified by the parties.

Proxense objects to Samsung’s identification of proposed “phrases” for construction, which consist of multiple terms, incomplete terms, and entire claim limitations that are not appropriate for construction. Proxense also objects to the number of terms Samsung has identified. The Court’s July 27, 2021 order specifies that the parties are limited to 12 terms. Samsung’s has proposed significantly more than 12 terms for construction, even after the September 30, 2021 revisions and narrowing offered by Samsung, and has further exceeded that limitation because several of the “phrases” proposed comprise multiple terms. The vast majority of the terms and “phrases” identified by Samsung cannot reasonably be construed as proposed, as indicated herein.

Samsung’s Invalidity Contentions are also vague and deficient. The Infringement Contentions do not adequately disclose Samsung’s invalidity theories and claim interpretations. Proxense reserves the right to alter the proposed constructions in the event Samsung’s Invalidity

Contentions later change.

The inclusion of any claim proposed construction, terms, phrase, or clause herein is not intended, and should not be construed to mean, that any such terms, phrases, or clauses have a special or uncommon meaning. Additionally, the inclusion of any proposed construction or the assertion that a construction is neither necessary nor possible and should not be construed as an admission that the term or phrase is indefinite, lacks enablement or adequate written description, or is otherwise incapable of being understood or construed.

Samsung's proposal to construe terms as they appear in unasserted claims is not proper. Proxense reserves the right to differentiate constructions for terms that are used differently in different claims, should a conflicting construction be proposed.

These constructions are preliminary and Proxense reserves the right to add, delete, and/or amend claim terms and proposed constructions based on, without limitation, the list(s) propounded by Samsung, the conferences called for by the Order Governing Proceedings, or any information learned throughout the course of discovery.

I. PROPOSED CONSTRUCTIONS OF SAMSUNG'S PROPOSED CLAIM TERMS

	US 8,352,730: Claim Term/Phrase	Proxense's Proposed Construction
1.	“Persistently storing . . . a tamper proof format written to a storage element on the integrated device that is unable to be subsequently altered” (Claims 1, 15) / “a tamper proof format written to the memory that is unable to be subsequently altered” (Claim 8).	No construction necessary or possible, plain and ordinary meaning. <i>See Footnote 1.</i> ¹
2.	“device ID Code” (Claims 1, 3, 8, 10, 12, 15).	A unique code identifying a device.
3.	“receiving an access message from the agent allowing the user access to an application” (Claims 1, 8, 15) / “receiving an access message from the agent” (Claim 12).	No construction necessary or possible, plain and ordinary meaning. <i>See Footnote 1.</i>
4.	“wherein the biometric data and the scan data are both based on a fingerprint scan by the user” (Claim 5).	No construction necessary or possible, plain and ordinary meaning. <i>See Footnote 1.</i>

	US 10,698,989: Claim Term/Phrase	Proxense's Proposed Construction
5.	“persistently storing” (Claim 1) / “persistent storage” (Claim 5) / “persistently stores” (Claim 7).	Storing data until purposefully erased (i.e., in non-volatile memory).
6.	“ID Code” (Claim 1, 2, 4-8)	A unique code identifying a device.
7.	“a transaction being completed responsive to the third-party trusted authority successfully authenticating the ID code” (Claims 1, 5) / “a transaction is completed responsive to successful authentication of the ID code” (Claim 7).	No construction necessary or possible, plain and ordinary meaning, already defined in the claim. <i>See Footnote 1.</i>

	US 9,298,905: Claim Term/Phrase	Proxense's Proposed Construction
8.	“persistently storing” (Claim 1) / “persistently stores” (Claims 9, 13).	Storing data until purposefully erased (i.e., in non-volatile memory).
9.	“ID Code” (Claim 1-3, 8-11, 13, 14).	A unique code identifying a device.
10.	“an access message from the third-party trusted authority-indicating that the third-party trusted authority successfully authenticated the ID code” (Claims 1, 9, 13).	No construction necessary or possible, plain and ordinary meaning. <i>See Footnote 1.</i>

¹ Proxense objects to the identified “phrase” for construction as it comprises multiple terms and, therefore, Samsung has not properly disclosed a specific term for construction per the Court’s rules. Moreover, the limits on the number of claims to be construed applies to proposed phrases that include multiple terms.

US 9,049,188: Claim Term/Phrase		Proxense's Proposed Construction
11.	“hybrid device” (Claims 1-12, 15, 20).	A device comprising an integrated personal digital key (PDK) and an integrated receiver-decoder circuit.
12.	“Personal digital key” (Claims 1, 10).	An operably connected collection of elements including an antenna and a transceiver for communicating with a RDC and a controller and memory for storing information particular to a user.
13.	“biometric information” (Claims 1, 4, 10, 13).	No construction necessary, plain and ordinary meaning.
14.	“financial information” (Claims 5, 6, 14, 17).	No construction necessary, plain and ordinary meaning. Information about the transaction.
15.	“receiver-decoder circuit” (Claims 1, 10).	A component or collection of components, capable of wirelessly receiving data in an encrypted format and decoding the encrypted data for processing.
16.	“inheritance information” (Claims 9, 18).	Information passed from a first device to a second device for use by the second device.
17.	“receiving a first signal at the integrated RDC” (Claim 10).	No construction necessary or possible, plain and ordinary meaning. <i>See Footnote 1.</i>

US 9,235,700: Claim Terms		Proxense's Proposed Construction
18.	“hybrid device” (Claims 1-13, 16)	A device comprising an integrated personal digital key (PDK) and an integrated receiver-decoder circuit.
19.	“Personal digital key” (Claims 1, 11).	An operably connected collection of elements including an antenna and a transceiver for communicating with a RDC and a controller and memory for storing information particular to a user.
20.	“biometric information” (Claims 4, 14).	No construction necessary, plain and ordinary meaning.
21.	“financial information” (Claims 1, 5, 6, 11, 15, 18).	No construction necessary, plain and ordinary meaning. Information about the transaction.
22.	“receiver-decoder circuit” (Claims 1, 11).	A component or collection of components, capable of wirelessly receiving data in an encrypted format and decoding the encrypted data for processing.

II. PROPOSED CONSTRUCTIONS OF PROXENSE'S PROPOSED CLAIM TERMS

	Claim Term	Proxense's Proposed Construction
1.	agent / third-party trusted authority (Claims 1, 8 of the '730 Patent; claims 1, 9, and 10 of the '905 Patent; claims 1, 4, 5 and 6 of the '989 Patent).	A third component that provides a second level of authentication.
2.	“access message” (Claims 1, 8, 12, 15 of the '730 Patent; claims 1, 9, 13 of the '905 Patents)	A notification.
3.	“device ID code” (Claims 1, 3, 8, 10, 12 and 15 of the '730 Patent) / “ID code” (Claims 1, 2, 3, 8, 10, 11, 13, 14 of the '905 Patent; claims 1, 2, 4-8 of the '989 Patent)	A unique code identifying a device.
4.	“tamper proof format” (Claims 1, 8, 15 of the '730 Patent).	A format for storing data that cannot be changed unless it is deleted and replaced.
5.	“enablement signal” (Claims 10-12, 17 of the '188 Patent; claims 11-13, 18 of the '700 Patent).	A message that enables or authorizes.